

LAW OFFICE OF RYAN S. GOLDSTEIN, P.L.L.C.  
1084 Morris Park Avenue, Second Floor  
Bronx, New York 10461  
(718) 239-0239  
*Attorneys for the Plaintiff*  
CHERYL BROWN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHERYL BROWN,

Civ No. 7:22-cv-03600 (CS)

Plaintiff,

- against -

MARSHALL OF MA, INC.,

Defendant,  
-----X

**PLAINTIFF'S DEMAND FOR FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS**

LAW OFFICE OF RYAN S. GOLDSTEIN, P.L.L.C.  
1084 Morris Park Avenue, Second Floor  
Bronx, New York 10461  
(718) 239-0239  
*Attorneys for the Plaintiff*  
CHERYL BROWN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHERYL BROWN,

Civ No. 7:22-cv-03600 (CS)

Plaintiff,

- against -

MARSHALL OF MA, INC.,

Defendant,  
-----X

**PLEASE TAKE NOTICE THAT**, Plaintiff, CHERYL BROWN ("hereinafter at times collectively referred to as "Plaintiff") by and through her attorneys, Law Office of Ryan S. Goldstein, P.L.L.C., hereby request that Defendant, MARSHALL OF MA, INC., pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedures, produce the following:

#### **DEFINITIONS AND INSTRUCTIONS**

The definitions set forth in Local Civil Rules 26 apply to this Request For Production.

#### **REQUESTS FOR PRODUCTION**

1. Copies of all incident, accident, aided or other reports prepared by or on behalf of the Defendant in connection with Plaintiff's accident which is the subject of this lawsuit. If Defendant claims any reports responsive to this request are privileged or otherwise not discoverable, provide a privilege log so this issue

can be addressed to the court.

2. Copies of all videos, surveillance or other visual recording that captured Plaintiff's accident which is the subject of this lawsuit. Plaintiff requests that Defendant provide no less than one hour, prior to Plaintiff's accident, up to and through Plaintiff's accident, of visual recordings.

3. Copies of all videos, surveillance or other visual recording that captured the location where Plaintiff's accident occurred, irrespective of whether Plaintiff's accident was captured. Plaintiff requests that Defendant provide no less than one hour, prior to Plaintiff's accident, up to and through Plaintiff's accident, of visual recordings.

4. Copies of any documentation pertaining to installation or affixing of the partition which is the subject of Plaintiff's accident. This request includes any documentation between the Defendant, or its agents, and any third-party companies, that performed the installation of the subject partition, at the direction and on behalf of the Defendant.

5. Copies of all contracts, agreements, purchase orders or other documentation specifically pertaining to the Defendant, or its agents, order of the subject partition(s) from any third-party companies.

6. Copies of all cleaning schedule(s) for the Defendant's store (located at 221 Central Park Ave, Hartsdale, NY 10530) that were in effect for June 9, 2021.

7. Copies of all employee lists (including managers and assistant managers) that were scheduled to work on June 9, 2021.

Dated: Bronx, New York  
May 31, 2022

**LAW OFFICE OF  
RYAN S. GOLDSTEIN, PLLC**

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Ryan S. Goldstein (RG 5231)  
Attorneys for Plaintiff  
CHERYL BROWN  
1084 Morris Park Avenue, Second Floor  
Bronx, New York 10461  
(718) 239-0239

To:

**Simmons Jannace DeLuca, LLP**  
Attorney for Defendant  
43 Corporate Drive  
Hauppauge, NY 11788-2048  
(631) 873-4888

**CERTIFICATE OF SERVICE**

I hereby certify that I made service of the foregoing **Plaintiff's Demand for First Request for Production of Documents** dated **May 31, 2022**, via ECF filing as well as by causing a true and correct copy thereof to be delivered by regular mailing, postage pre-paid, to the following:

**Simmons Jannace DeLuca, LLP**  
Attorney for Defendant  
43 Corporate Drive  
Hauppauge, NY 11788-2048  
(631) 873-4888

Dated:           Bronx New York  
                    May 31, 2022

S/ \_\_\_\_\_  
Ryan S. Goldstein (RG 5231)

